

APR 10 2015

UNITED STATES DISTRICT COURT **Clerk of Court**

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA  
V.

## CRIMINAL COMPLAINT

Juana Maria VALDEZ-Cavazos  
Mexican Citizen  
YOB: 1960

Case Number: M-15-0548-M

I, Ernest Baca, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about April 09, 2015 in Hidalgo County, in  
(Date)  
the Southern District of Texas the defendant(s) did,

Knowing and in reckless disregard of the fact that Rogelio MERCADO-Alfaro and Octavio GUZMAN-Morales, who were aliens, who had come to, entered and remained in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such aliens in any place, including any building or any means of transportation; to wit a residence in Alton, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii).I further state that I am a(n) Special Agent and that this complaint is based on the  
Official Title  
following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ NoEB  
Signature of Complainant

Ernest Baca, HSI Special Agent

Printed Name of Complainant

Approved to file Kimberly Ann Lee  
AUSA  
Sworn to before me and signed in my presence,April 10, 2014  
Date

At

McAllen, Texas  
City and StateU.S. Magistrate Judge Dorina Ramos  
Name and Title of Judicial OfficerDorina Ramos  
Signature of Judicial Officer

**Attachment "A"**

On April 9, 2015, the Mission Police Department received a report of a stolen cargo trailer. At approximately 7:47am the Mission Police Department located and stopped a semi-truck hauling the stolen cargo trailer. The individual driving the truck was identified as James L. NICKERSON. A subsequent inspection of the cargo trailer revealed that Rogelio MERCADO-Alfaro and Octavio GUZMAN-Morales were located inside the cargo trailer. An additional twenty (20) illegal aliens were also discovered inside the cargo trailer.

On April 9, 2015, at approximately 10:49am, Special Agent Ernest Baca and Detective Gerardo Perez interviewed James L. NICKERSON. NICKERSON stated that followed an unidentified individual to a lot behind Pueblo Tire in Mission and hooked up the Cargo trailer. NICKERSON stated that he then followed the unidentified individual to a blue house and was instructed to back the tractor trailer up next to the house and then was instructed to take a ride with the unidentified individual. NICKERSON stated that shortly thereafter he was returned to the tractor trailer and instructed to drive to Highway 83 and travel west. NICKERSON was told that he would receive further instructions once on Highway 83.

Special Agent Baca and Task Force Officer Perez reviewed tracking information from the trailer's GPS tracking system. Tracking information from that morning identified 3508 Janie Street, Alton, Texas as being a possible location for the blue house mentioned by NICKERSON. A subsequent surveillance of 3508 Janie Street revealed that the location was in fact a blue house.

On April 9, 2015, at approximately 2:00pm, a consent search was conducted at 3508 Janie Street, Alton, Texas. Agents identified Juana Maria VALDEZ-Cavazos, a citizen of Mexico, as the person renting the residence. It was also determined at that time that VALDEZ-Cavazos was in the United States illegally. Agents subsequently transported VALDEZ-Cavazos to the Mission Police Department for further questioning.

On April 9, 2015, at approximately 3:06pm, Special Agent Ernest Baca and Task Force Officer Gerardo Perez informed VALDEZ-Cavazos of her Miranda Rights. VALDEZ-Cavazos waived her Miranda rights and agreed to answer questions. VALDEZ-Cavazos stated that she was contacted by a person she knew "Paola" to house and care for illegal aliens at her residence. VALDEZ-Cavazos was promised payment of \$100 in United States Currency for each alien housed. VALDEZ-Cavazos stated that over a period of days individuals brought illegal aliens to her residence. VALDEZ-Cavazos stated that in the early morning two cars arrived with a tractor-trailer. VALDEZ-Cavazos further stated that approximately 20 aliens were loaded in to the cargo trailer through the back door of the residence and the tractor-trailer departed the residence.

On April 9, 2015, Octavio GUZMAN-Morales and Rogelio MERCADO-Alfaro both identified VALDEZ-Cavazos in a photo lineup as the caretaker of the residence they were being housed at before being loaded in to the cargo trailer.

Assistant United Attorney Leo J. Leo was contacted and presented the facts of the investigation. AUSA Leo accepted prosecution on VALDEZ-Cavazos for violations of 8USC1324.